

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LOUIS McBRIDE,
Plaintiff,

CIVIL ACTION
NO: 05-11664-GAO

vs.

WOODS HOLE, MARTHA'S VINEYARD &
NANTUCKET STEAMSHIP AUTHORITY and
LAFLEUR CRANE SERVICE, INC.,
Defendants.

JOINT MOTION TO EXTEND THE DISCOVERY DEADLINE, REFER THIS
MATTER TO MEDIATION, AND TO CONTINUE THE SEPTEMBER 6, 2006
STATUS CONFERENCE

Now come the parties, in the above-entitled action,
by and through their undersigned attorneys, and
respectfully moves this Honorable Court to extend the
discovery deadline, refer this case Magistrate Judge
Bowler for Mediation, and to continue the September 6,
2006 scheduled Status Conference. As grounds in support,
the parties submit the following for the Court's
consideration.

1. The parties have been experiencing difficulty in concluding factual discovery because of the potential witnesses' deposition availability, and the trial and vacation schedules of counsel. Although the parties have completed significant discovery, they need an additional two (2) months to complete the factual discovery necessary for trial.
2. At the conclusion of factual discovery and prior to obtaining expert depositions, the parties have agreed to attend Mediation in an effort to resolve this matter without incurring any additional litigation

costs. The parties request that this matter be referred to Magistrate Judge Bowler for Mediation, and that the September 6, 2006 scheduled Status Conference be continued.

3. The parties will submit a Status Report following Mediation. If the case does not settle, then the parties will request an additional month to complete expert discovery and submit dispositive motions, if any, and will also request that a Status Conference be scheduled at that time.

WHEREFORE, the parties pray that this Honorable Court extend the discovery deadline by two (2) months and refer this matter to Magistrate Judge Bowler for Mediation prior to completing expert discovery and submitting dispositive motions, if any.

Respectfully submitted,

FOR THE PLAINTIFF

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**FOR LaFLEUR CRANE SERVICE,
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Dated: July 24, 2006